

USAC Appeal re: Fremont Co School District 24

BEN 142529- FY2013

July 25, 2018

Letter of Appeal - Case # *(filed electronically)*

Schools and Libraries Division, Box 125 – Correspondence Unit
80 South Jefferson Road, Whippany, NJ 07981

Required Information:

Funding Year:	2013
Applicant Name:	Fremont Co School District 24
Billed Entity # :	142529
Form 471 Application#:	907157
 FRN #:	 2491724
Service Provider Name:	TNCI Operating Company LLC
Service Provider SPIN:	143037263

Contact Information:

Contact Person Name:	Nicole Stone
Contact Title:	Administrative Assistant
Contact Person Phone:	307-876-2583
Contact Person E-Mail:	nstone@fremont24.com

Contact Person Name	
To discuss the appeal:	Lori Thompson
Contact Title:	Erate Consultant
Contact Person Phone:	636-294-7117
Contact Person E-Mail:	lori@btu-consultants.com

SLD action being appealed:

This is an appeal to the Recovery of Improperly Disbursed Funds Letter dated June 18, 2018. It states that Fremont Co School District 24 received disbursements after the Invoice Deadline. For recurring services, invoices must be submitted no later than 120 days after the last day to receive service or 120 days after the FCC Form 486 Notification Letter date, whichever is later. Services must be delivered within the funding year. Your invoice was received after the invoice deadline. Therefore, USAC must seek recovery of improperly disbursed funds in the amount of \$1,433.23. See Attachment A.

Basis for this appeal:

Fremont Co School District 24 believes that the BEAR invoice ID 2656424 was filed prior to the Last Date to Invoice based upon the Administrator's Decision on FCC Remand – Funding Year

FCC Appeal of USAC Decision

Fremont Co School District #24 – BEN 142529 – FY2013

December 2, 2018

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554 *(submitted electronically via ECFS)*

Appeal – CC Docket Nos. 96-45 and 02-6

USAC Appeal Decision Date: October 5, 2018 (Attachment A)

Form 471 Number: 907157

Funding Request Number (FRN): 2491724

Funding Year: 2013

Billed Entity Name: Fremont Co School District #24

BEN: 142529

Contact Information:

Contact Person Name: Lori Thompson
Contact Person Phone: 636-294-7117
Contact Person Fax: 636-294-2188
Contact Person E-Mail: lori@btu-consultants.com

Decision being appealed: USAC's Denial of our Appeal Dated October 5, 2018 (our original appeal date was July 25, 2018).

Text from USAC Denial Letter (SLD Denial Letter is included as Attachment B)

"The invoicing deadline for Funding Request Number (FRN) 2491724 was October 23, 2015. The District did not submit a BEAR for for that FRN by that deadline, and therefore was ineligible for relief under the Jefferson-Madison Reconsideration Order. However, USAC erroneously identified the District as an applicant who qualified for the relief and improperly extended the invoice filing deadline for FRN 2491724 to September 1, 2017. Because USAC is not authorized to waive the FCC's invoicing deadline rules, USAC must recover funding that was disbursed in violation of the FCC's rules. For these reasons, your appeal is denied."

Background:

Fremont Co School District #24 received a letter from USAC for Recovery of Improperly Disbursed Funds for FRN 2491724 on June 18, 2018 (Attachment C). The District filed the BEAR on this FRN based upon a Letter from USAC "Administrator's Decision on FCC Remand – Funding Year 2013" (Attachment D). Below is a timeline for this FRN.

BEAR invoice id: 2082445 – Service Provider did not certify BEAR	Filed on 10/7/14	Attachment E
Invoice Deadline Extension Request	Filed 10/27/2014	Attachment F
Invoice Deadline Extension Request	Filed 7/17/2015	Attachment G
Mailed Paper BEAR	Mailed 10/14/15	Attachment H
Received Letter from USAC relief FCC order DA 17-526	Aug 2, 2017	Attachment D
BEAR filed invoice id: 2133143	Filed Aug 9, 2017	Attachment I
Recovery of Improperly Disbursed Funds Letter	June 18, 2018	Attachment C

FCC Appeal of USAC Decision

Fremont Co School District #24 – BEN 142529 – FY2013

Details and Requested Action: We are presenting one line of reasoning to this appeal that was not presented in the USAC appeal to the FCC for reconsideration.

Fremont Co School District 24 believes that the BEAR invoice ID 2133143 (Attachment I) was filed prior to the Last Date to Invoice based upon the Administrator's Decision on FCC Remand – Funding Year 2013 dated August 2, 2017. See attachment D. The district filed an electronic BEAR Form on October 7, 2014 (Attachment E) that was never certified by the service provider, then a paper BEAR was filed on October 14, 2015 (Attachment H) and a final electronic BEAR invoice ID 2133143 (Attachment I) was filed on August 9, 2017.

We would also like for the FCC to take into consideration that recovery of funds, properly committed, but paid under an erroneously applied invoice extension, "...may not be appropriate for violation of procedural rules codified to enhance operation of the e-rate program" (see [FCC 04-190](#), ¶19).

Summary and Requested Action:

We request that FCC examine the attached response, reconsider the decision made in USAC letter and approve FRN 2491724 and its corresponding BEAR form.

We appreciate your time and consideration.

Sincerely,

(filed electronically via SLD website)

Lori Thompson, E-Rate Consultant to Fremont Co School District #24

Telephone: 636-294-7117

lori@btu-consultants.com

Included below:

Attachment A: Fremont Co School District #24 Appeal to SLD dated July 25, 2018

Attachment B: USAC's Denial of Fremont Co School District #24 Appeal dated October 5, 2018.

Attachment C: USAC's letter for Recovery of Improperly Disbursed Funds dated June 18, 2018.

Attachment D: USAC's letter "Administrator's Decision on FCC Remand – Funding Year 2013.

Attachment E: BEAR invoice id: 2082445 – Service Provider did not certify BEAR

Attachment F: Invoice Deadline Extension Request – dated 10/27/2014

Attachment G: Invoice Deadline Extension Request – dated 07/07/2015

Attachment H: Mailed paper BEAR – 10/15/2015

Attachment I: BEAR filed invoice id: 2133143 – dated 08/09/2017

(submitted electronically via ECFS)

USAC Appeal re: Fremont Co School District 24

BEN 142529- FY2013

2013 dated August 2, 2017. See attachment B. The district filed an electronic BEAR Form on October 7, 2014 that was never certified by the service provider, then a paper BEAR was filed on October 14, 2015 and a final electronic BEAR invoice ID 2133143 was filed on August 9, 2017. See attachments C, D and E.

Summary and Requested Action:

We request that USAC examine the attached response, reconsider the decision made in this letter and approve FRN 2491724 and its corresponding BEAR form.

Thank you.

Sincerely,
(filed electronically via EPC website)
Lori Thompson
E-rate Consultant
BTU Consultants LLC

Attachment A – Recovery of Improperly Disbursed Funds
Attachment B – Administrator’s Decision on FCC Remand – Funding Year 2013
Attachment C – Form 472 TNCI 2013 Fremont
Attachment D – Form 472 TNCI 2013 Fremont paper 10.13.15
Attachment E - Form 472 TNCI 2013 Fremont 8.9.17



Administrator's Decision on Appeal – Funding Year 2013

October 5, 2018

Lori Thompson
BTU Consultants
1293 Pinehurst Club Court
O'Fallon, MO 63366

Re: Applicant Name: Fremont Co School District 24
Billed Entity Number: 142529
Form 471 Application Number: 907157
Funding Request Number(s) (FRN): 2491724
Your Correspondence Received Date: July 25, 2018

The Universal Service Administrative Company (USAC) has completed its evaluation of the July 25, 2018 letter of appeal (Appeal) submitted by Pikeville Fremont Co School District 24 (the District).¹ The Appeal requests that USAC cease its recovery action because the District timely submitted its invoice before the extended September 1, 2017 invoicing deadline.²

USAC has reviewed the appeal and the facts related to this matter and determined that it cannot grant the appeal because USAC is not authorized to waive the Federal Communications Commission (FCC) rules.³ USAC is also required to seek recovery for funding that is disbursed in violation of the FCC rules.⁴

On May 30, 2017, the Federal Communications Commission (FCC) issued the *Jefferson-Madison Reconsideration Order* directing USAC to identify and allow all applicants who timely filed their Billed Entity Application for Reimbursement (BEAR) forms to be

¹ Letter from Lori Thompson, Consultant, BTU Consultants to Schools and Libraries Division, USAC (July 25, 2018) (*Appeal*).

² *Id.* at 2.

³ See generally, 47 C.F.R. § 54.702(c) (2013) (“[USAC] may not make policy, interpret unclear provisions of the statute or rules, or interpret the intent of Congress.”). See also 47 C.F.R. § 54.719(c) (“Parties seeking waivers of the Commission’s rules shall seek relief directly from the Commission.”).

⁴ See *Changes to the Bd. Of Directors of the Nat’l Exchange Carrier Association, et al.*, CC Docket Nos. 96-45, *et al.*, Order, FCC 99-291 (1999) (*Commitment Adjustment Order*); *Changes to the Bd. Of Directors of the Nat’l Exchange Carrier Association, et al.*, CC Docket Nos. 96-45, *et al.*, Order, 15 FCC Rcd 7197 (1999) (*Commitment Adjustment Waiver Order*); *Changes to the Bd. of Directors of the Nat’l Exchange Carrier Association, et al.*, CC Docket Nos. 96-45, *et al.*, Order, 15 FCC Rcd 22975 (2000) (*Commitment Adjustment Implementation Order*).



allowed to resubmit their BEAR forms even if their service provider failed to certify the BEAR form prior to the original invoicing deadline.⁵

The invoicing deadline for Funding Request Number (FRN) 2491724 was October 23, 2015. The District did not submit a BEAR form for that FRN by that deadline, and therefore was ineligible for relief under the *Jefferson-Madison Reconsideration Order*. However, USAC erroneously identified the District as an applicant who qualified for the relief and improperly extended the invoice filing deadline for FRN 2491724 to September 1, 2017.⁶ Because USAC is not authorized to waive the FCC's invoicing deadline rules,⁷ USAC must recover funding that was disbursed in violation of the FCC's rules.⁸ For these reasons, your appeal is denied.

If you want to seek a waiver of FCC rules, or if you wish to appeal this decision, you must submit your request for waiver or appeal to the FCC within 60 days of the date of this decision letter. On all communications with the FCC, be sure to reference CC Docket No. 02-6. The FCC recommends filing with the Electronic Comment Filing System (ECFS) to ensure timely filing. You can find instructions for using ECFS on the ECFS Online Manual page of the FCC's website. The FCC will consider electronic filings as filed on a business day if they are received before midnight ET. If you have questions or comments about using the ECFS, please contact the FCC directly at (202) 418-0193 or via email. For additional information about submitting appeals or waiver requests to the FCC, including options to submit via U.S. mail or hand delivery, visit the FCC's website at: <https://www.fcc.gov/reports-research/guides/how-file-paper-documents-fcc>.

⁵ *Petition for Reconsideration by Jefferson-Madison Regional Library*, CC Docket No. 02-6, Order on Reconsideration, 32 FCC Rcd 4626, 4632, para. 15 (2017).

⁶ See Letter from Schools and Libraries Division, USAC to Nicole Stone, Fremont Co School District 24 (Aug. 2, 2017) (notifying the District that it qualified for relief pursuant to the *Jefferson-Madison Order* and extending the invoicing deadline to September 1, 2017).

⁷ See generally, 47 C.F.R. § 54.702(c) (2013) ("[USAC] may not make policy, interpret unclear provisions of the statute or rules, or interpret the intent of Congress."). See 47 C.F.R. § 54.719(c) ("Parties seeking waivers of the Commission's rules shall seek relief directly from the Commission."). *Request for Review of the Decision of the Universal Service Administrator by Merced Union High School*, CC Docket No. 96-45, Order, 15 FCC Rcd 18803, 18805 (2000) ("We note that rules and policies are enforced even where a party received erroneous advice from a government employee, and the Commission is not estopped from enforcing its rules in a manner that is inconsistent with the advice provided by the employee, particularly when the relief requested would be contrary to an applicable statute or rule.").

⁸ See *Changes to the Bd. Of Directors of the Nat'l Exchange Carrier Association, et al.*, CC Docket Nos. 96-45, et al., Order, FCC 99-291 (1999) (*Commitment Adjustment Order*); *Changes to the Bd. Of Directors of the Nat'l Exchange Carrier Association, et al.*, CC Docket Nos. 96-45, et al., Order, 15 FCC Rcd 7197 (1999) (*Commitment Adjustment Waiver Order*); *Changes to the Bd. of Directors of the Nat'l Exchange Carrier Association, et al.*, CC Docket Nos. 96-45, et al., Order, 15 FCC Rcd 22975 (2000) (*Commitment Adjustment Implementation Order*).



Schools and Libraries Division
Universal Service Administrative Company

CC: Nicole Stone
Fremont Co School District 24
112 West Third Street
Shoshoni, WY 82649



Recovery of Improperly Disbursed Funds Letter

Nicole Stone
 FREMONT CO SCHOOL DISTRICT 24
 404 Wrangler Way
 SHOSHONI, WY 82649

6/18/2018

Our review of your Schools and Libraries Universal Service Support Program (or E-rate) funding request has determined funds were committed in violation of Federal Communications Commission (FCC) rules. You have 60 days from the date of this letter to appeal the following decision(s). For more detailed information see below.

Total amount to be recovered: \$1,433.23

<i>FCC Form 471</i>	<i>FRN</i>	<i>Commitment adjustment</i>	<i>Total amount to be recovered</i>	<i>Explanation(s)</i>	<i>Party to recover from</i>
907157	2491724	\$0.00	\$1,433.23	FCC Directive	Applicant

See Attached Adjustment Report for more information on the specific FRNs and Explanations listed above.

Recovery of Improperly Disbursed Funds

Our review of your Universal Service Schools and Libraries Support Program (or E-rate) funding request(s) referenced in the Adjustment Report has determined funds were improperly disbursed in violation of Federal Communications Commission (FCC) rules. A copy of that Adjustment Report is also attached to this letter.



FCC rules require the Universal Service Administrative Company (USAC) to rescind commitments and recover funding when it is determined that funding was committed and disbursed in violation of the rules. This letter notifies you that USAC will be adjusting your funding commitment(s) and provides information on how to appeal this decision.

This is NOT a bill. If disbursed funds need to be recovered, USAC will issue a Demand Payment Letter. The debt referenced in the Demand Payment Letter will be due within 30 days of that letter's date. Failure to pay the debt may result in interest, late payment fees, and administrative charges and will invoke the FCC's "Red Light Rule."

FCC's Red Light Rule

The FCC Red Light Rule requires USAC to dismiss pending FCC Form 471 applications, appeals, and invoices or to net disbursements offsetting the debt if the entity responsible for paying the outstanding debt owed to the FCC has not paid the debt or made satisfactory arrangements to pay the debt within 30 days of the Demand Payment Letter. For information on the Red Light Rule, see

<https://www.fcc.gov/licensing-databases/fees/debt-collection-improvement-act-implementation>

To Appeal This Decision

If you wish to contest any part of this letter, you must first file an appeal with USAC to seek review of the decision. Parties that have filed an appeal with USAC and received an adverse decision may, if they choose, appeal USAC's decision to the FCC. Parties seeking a waiver of a codified FCC rule should file a request for waiver directly with the FCC because USAC cannot waive FCC rules. Your appeal to USAC or waiver request to the FCC must be filed within 60 days of the date of this letter.

All appeals filed with USAC must be filed in EPC by selecting "Appeal" from the menu in the top right hand corner of your landing page and providing the requested information.

Your appeal should include the following information. (Because you file the appeal through your EPC account, the system will automatically fill in some of these components for you).

- 1) Name, address, telephone number, and email address for the contact person for this appeal.
- 2) Indicate specifically that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., Recovery of Improperly Disbursed Funds) and the decision you are appealing:



- a. Appellant name;
- b. Applicant name and service provider name, if different from appellant;
- c. Applicant BEN and Service Provider Identification Number (SPIN);
- d. FCC Form 471 Application Number and the Funding Request Number (FRN) or Numbers as assigned by USAC;
- e. "Recovery of Improperly Disbursed Funds," AND the exact text or the decision that you are appealing.

3) Identify the problem and the reason for the appeal and explain precisely the relief sought. Please keep your appeal to the point, and provide supporting documentation. Be sure to keep a copy of your entire appeal, including any correspondence and documentation. A copy will automatically be saved for you in EPC. USAC will reply to your appeal submission to confirm receipt.

For more information on submitting an appeal to USAC including step by step instructions on how to file the appeal through EPC, please see "Appeals" in the Schools and Libraries section of the USAC website.

As mentioned, parties seeking a waiver of FCC rules or that have filed an appeal with USAC and received a decision may file a request for waiver or appeal USAC's decision to the FCC. Waiver requests or appeals to the FCC must be made within 60 days of the issuance of USAC's decision and include all of the information referenced above for appeals to USAC.

The FCC recommends filing appeals or waiver requests with the Electronic Comment Filing System (ECFS) to ensure timely filing. Electronic waiver requests or appeals will be considered filed on a business day if they are received at any time before 11:59 PM ET. If you have questions or comments about using the ECFS, please contact the FCC directly at (202) 418-0193.

For more information about submitting waiver requests or appeals to the FCC, including options to submit the waiver request or appeal via U.S. mail or hand delivery, visit the FCC's website.

Schools and Libraries Division

cc: Collin Greene
TNCI Operating Company LLC



Adjustment Report

FCC Form 471 Application Number:	907157
Funding Request Number:	2491724
Commitment Adjustment:	\$0.00
Total Amount to Be Recovered:	\$1,433.23
Explanation(s):	FCC Directive
Party to Recover From:	Applicant
Funding Year:	2013
Billed Entity Number:	142529
Services Ordered:	TELCOMM SERVICES
Service Provider Name:	TNCI Operating Company LLC
SPIN:	143037263
Original Funding Commitment:	\$1,726.34
Adjusted Funding Commitment:	\$1,726.34
Funds Disbursed to Date:	\$1,433.23

Funding Commitment Adjustment Explanation

You received disbursements after your invoice deadline. For recurring services, invoices must be submitted no later than 120 days after the last day to receive service or 120 days after the FCC Form 486 Notification Letter date, whichever is later. Services must be delivered within the fund year. Your invoice was received after the invoice deadline. Therefore, USAC must seek recovery of improperly disbursed funds in the amount of \$1,433.23.



Schools and Libraries Division

Administrator's Decision on FCC Remand - Funding Year 2013

August 2, 2017

Nicole Stone
FREMONT CO SCHOOL DISTRICT 24
404 Wrangler Way
SHOSHONI, WY 82649

Re: Applicant Name: FREMONT CO SCHOOL DISTRICT 24
Billed Entity Number: 142529
Form 471 Application Number: 907157
Funding Request Number: 2491724
FCC Order: 17-526
FCC Order Release Date: May 30, 2017
Invoice Due Date: September 1, 2017

Dear Program Participant:

You are receiving this Administrator's Decision Letter because USAC has identified you as qualifying for relief provided for in FCC Order DA 17-526 released on May 30, 2017.

In DA 17-526, the FCC directed USAC to allow applicants to resubmit invoices, or Billed Entity Applicant Reimbursement (BEAR) forms, which had been timely filed between August 2014 and July 2016 and that were rejected "based on a lack of timely service provider certification before the invoice filing deadline." The FCC directed USAC to allow for resubmission of these BEARs and processing within the next 90 days.

We have identified your BEAR form for the invoice # 2082445 where the system change prevented service providers from certifying BEARs that were pending on July 1, 2016. The remaining commitment on this Funding Request is \$1726.34.

Please resubmit your BEAR form for the information identified above by September 1, 2017 for processing.

If you need further assistance with filing your BEAR form, please see the BEAR form instructions on the USAC website or contact our Client Service Bureau (CSB) at 1-888-203-8100.

In addition, please note, service providers need to annually file a Service Provider Annual Certification (SPAC) Form, to certify they will comply with program rules. Your service provider(s) must have a SPAC Form on file for each Service Provider Identification Number (SPIN) indicated on your BEAR form.

Sincerely,

Schools and Libraries Division
Universal Service Administrative Company



Need Help?



- BEAR Home
- New BEAR Form
- Track Form
- Bulk Download
- Terms and Conditions
- Logout

View BEAR Invoice

PRINTABLE PAGE

The following invoice has been successfully submitted for certification:
Invoice ID: 2082445
Created on 10/7/2014 5:31 PM
Last updated on 10/7/2014 5:31 PM

Applicant Form Identifier WYFR472.13 TNCI

Block 1: Header Information

Need Help?

1. Billed Entity Name FREMONT CO SCHOOL DISTRICT 24	2. Billed Entity Number 142529	3. Service Provider Identification Number (SPIN) 143016432
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4. Contact Name	KAY WATSON
5. Contact Telephone Phone	(307) 876-2583
Contact Fax	(307) 876-2469
Contact Email	kwatson@fremont24.com

6. Total Reimbursement Amount
(total from Block 2, Column 14)

\$ 1433.23

Block 2: Line Item Information Per Funding Request Number

Need Help?

7. FCC Form 471 Application Number (from Funding Commitment Decision Letter)	8. Funding Request Number (FRN) (from Funding Commitment Decision Letter)	10. Customer Billed Date	11. Shipping date to Customer or Last Day of Work Performed (mm/dd/yyyy)	12. Total (Undiscounted) Amount for Service	13. Discount Rate	14. Discount Amount Billed to USAC (Column 12 multiplied by Column 13)	Approval Status
1) 907157	2491724	7/1/2013		\$ 2388.71	60	\$ 1433.23	AWAITING SP CERTIFICATION

Block 3: Billed Entity Certification

Need Help?

Contact Information for Billed Entity Authorized Person:

By logging into your account using your PIN, checking this box, and clicking the "certify" button at the end of the form, you have electronically signed the form. You are reminded that an electronic signature is the same as a handwritten signature on the form. To see a copy of the Terms and Conditions to which you previously agreed, please click on the "Terms and Conditions" menu above.

Submission Date 10/7/2014

17. Name	KAY WATSON	19. Phone Number	(307) 876-2583
18. Title/Position	BUSINESS MANAGER	19a. Fax Number	(307) 876-2469
20. Address 1	112 WEST THIRD ST	19b. Email	kwatson@fremont24.com
Address 2		19c. Name of Authorized Person's Employer	Fremont County School District #24
City	SHOSHONI		
State	WY		
Zip Code	82649 -		

27. Applicant Remittance Information

Name	KAY WATSON
Title/Position	BUSINESS MANAGER
Phone Number	(307) 876-2583
Address 1	112 WEST THIRD ST
Address 2	
City	SHOSHONI
State	WY
Zip Code	82649

Additional Comments:

This is for account number 52485. All ineligible charges have been removed.

OMB Number 3060 - 0856 Form 472

Invoice Deadline Extension Request

October 27, 2014

To: Invoice Deadline Extension Request (filed online)
 Schools and Libraries Division
 Whippany, NJ 07981

RE: **Case# 22-686789** Invoice Deadline Extension Request

This is a request for an extension of time to file invoices as shown below. A signed LOA is attached to this request.

Applicant Name:	Fremont County School District #24
Applicant BEN:	142529
Contact Person Name:	Lori Thompson
Contact Person Phone:	636-294-7117
Contact Person Fax:	636-294-2188
Contact Person E-Mail:	lori@btu-consultants.com
Form 471 Application Number:	See Table Below
FRN #:	See Table Below
Service Provider Name:	See Table Below
SPIN #:	See Table Below
USAC Invoice#:	To be determined
Amount of Invoice:	Unknown

471 Application Number	FRN	SPIN	Service Provider Name	Funding Year
907157	2491724	143016432	Trans National Communications International, Inc.	2013
907157	2491772	143008370	WYOMING.COM	2013
907157	2491801	143002540	RT Communications, Inc.	2013

Reason for Invoice Deadline Extension request: We are still working with Service Provider Invoices to determine the eligible amount.

Thank you for your consideration and please notify us when you have processed our request, or contact me if you need additional information.

Sincerely,
(filed electronically via SLD website)
 Lori Thompson
 E-Rate Consultant

Invoice Deadline Extension Request

July 17, 2015

To: Invoice Deadline Extension Request (filed online)
 Schools and Libraries Division
 Whippany, NJ 07981

RE: **Case# 22-811224** Invoice Deadline Extension Request

This is a request for an extension of time to file invoices as shown below. A signed LOA is attached to this request.

Applicant Name:	Fremont County School District #24
Applicant BEN:	142529
Contact Person Name:	Lori Thompson
Contact Person Phone:	636-294-7117
Contact Person Fax:	636-294-2188
Contact Person E-Mail:	lori@btu-consultants.com
Form 471 Application Number:	See Table Below
FRN #:	See Table Below
Service Provider Name:	See Table Below
SPIN #:	See Table Below
USAC Invoice#:	To be determined
Amount of Invoice:	Unknown

471 Application Number	FRN	SPIN	Service Provider Name	Funding Year
907157	2491724	143037263	Trans National Communications International, Inc.	2013

Reason for Invoice Deadline Extension request: We are still working with Service Provider Invoices to determine the eligible amount.

Thank you for your consideration and please notify us when you have processed our request, or contact me if you need additional information.

Sincerely,
(filed electronically via SLD website)
 Lori Thompson
 E-Rate Consultant

Do not write in this space	
Universal Service for Schools and Libraries	
BILLED ENTITY APPLICANT REIMBURSEMENT FORM	
For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant. Only one Service Provider Identification Number (SPIN) per form.	
Must be completed and signed by the Billed Entity Applicant and signed by the relevant service provider.	
Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.	
C NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT	
154 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being deemed without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.	
2 public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Act Project (3060-0856), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act projects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.	
member - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0856.	
E FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.	
Applicant Form Identifier (Create an identifier for your own reference) FRA72.13 TNCI	FCC Form 472 Invoice # (To be inserted by administrator)
BLOCK 1: HEADER INFORMATION	
Billed Entity Name	Fremont County School District #24
Billed Entity Number	142529
Service Provider Identification Number (SPIN)	143037263
Contact Name	Nicole Stone
Contact Telephone Number	307-876-2583
Total Reimbursement Amount (total from Block 2, Column 14) \$1,433.23	

Approved by OMB
OMB Control No. 3060 - 0856
Estimated time per response: 1.0 hour

Billed Entity Applicant Reimbursement Form							
For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.							
Billed Entity Name Fremont County School District #24		Billed Entity Number 142529					
Contact Name Nicole Stone		Contact Telephone Number 307-876-2583					
Applicant Form Identifier WYFR472.13 TNCI							
BLOCK 2: LINE ITEM INFORMATION PER FUNDING REQUEST NUMBER							
(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
FCC Form 471 Application Number (from Funding Commitment Decision Letter)	Funding Request Number (FRN) (from Funding Commitment Decision Letter)	Bill Frequency	Customer Billed Date (mm/yyyy)	Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	Total (Undiscounted) Amount for Service	Discount Rate	Amount Billed to USAC (Column 12 multiplied by Column 13)
DO NOT WRITE IN THIS COLUMN.							
1	907157	2491745	07/2013		\$2,388.71	0.60	\$1,433.23
2							\$0.00
3							\$0.00
4							\$0.00
5							\$0.00
6							\$0.00
7							\$0.00
8							\$0.00
9							\$0.00
10							\$0.00
11							\$0.00
12							\$0.00
13							\$0.00
14							\$0.00
TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM (6)						\$1,433.23	

Approved by OMB
OMB Control No. 3060 – 0856
Estimated time per response: 1.0 hour

BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name Fremont County School District #24

Billed Entity Number 142529

Contact Name Nicole Stone

Applicant Form Identifier WYFR472.13 TNCI

Block 3: Billed Entity Certification

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Billed Entity Applicant Reimbursement Form on behalf of the eligible schools, libraries, or consortia of those entities represented on this Form, and I certify to the best of my knowledge, information and belief, as follows:

- A. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form represent charges for eligible services delivered to and used by eligible schools, libraries, or consortia of those entities for educational purposes, on or after the service start date reported on the associated FCC Form 486.
- B. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form were already billed by the service provider and paid by the Billed Entity Applicant on behalf of eligible schools, libraries, and consortia of those entities.
- C. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form are for eligible services approved by the fund administrator pursuant to a Funding Commitment Decision Letter.
- D. I recognize that I may be audited pursuant to this application and will retain for at least five years (or whatever retention period is required by the rules in effect at the time of this certification), after the last day of service delivered in this funding year any and all records that I rely upon to fill in this form.
- E. I certify that, in addition to the foregoing, this Billed Entity Applicant is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

15. Signature of authorized person

Kay Watson

16. Date

10/14/15

17. Printed name of authorized person

Kay Watson

18. Title or position of authorized person

CFO/Business Manager

19. Telephone number of authorized person

307-876-2583

20. Address of authorized person

112 West Third Street
Shoshoni, WY 82649

Approved by OMB
OMB Control No. 3060 – 0856
Estimated time per response: 1.0 hour

BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name Fremont County School District #24

Billed Entity Number 142529

Contact Name Nicole Stone

Applicant Form Identifier WYFR472.13 TNCI

Block 4: Service Provider Acknowledgment

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Service Provider Acknowledgment for this Billed Entity Applicant Reimbursement Form, and acknowledge to the best of my knowledge, information and belief, as follows:

- A. The service provider must remit the discount amount authorized by the fund administrator to the Billed Entity Applicant who prepared and submitted this Billed Entity Applicant Reimbursement Form as soon as possible after the fund administrator's notification to the service provider of the amount of the approved discounts on this Billed Entity Applicant Reimbursement Form, but in no event later than 20 business days after receipt of the reimbursement payment from the fund administrator, subject to the restriction set forth in B. below.
- B. The service provider must remit payment of the approved discount amount to the Billed Entity Applicant prior to tendering or making use of the payment issued by the Universal Service Administrative Company to the service provider of the approved discounts for the Billed Entity Applicant Reimbursement Form.
- C. I certify that, in addition to the foregoing, this Service Provider is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

21. Signature of authorized person (fax, copy or original signature)

22. Date

23. Printed name of authorized person

24. Title or position of authorized person

25. Telephone number of authorized person

26. Address of authorized person

27. Applicant Remittance Information

Name Nicole Stone

Title Administrative Assistant

Street Address 112 West Third Street
Shoshoni, WY 2469

Approved by OMB
OMB Control No. 3060 – 0856
Estimated time per response: 1.0 hour

A paper copy of this Form (pages 1-4) should be mailed to:
SLD BEAR FCC Form 472
P. O. Box 7026
Lawrence, KS 66044-7026

If sent by express delivery services or U.S. Postal Service, Return Receipt Requested, the form (pages 1-4) should be mailed to:

SLD Forms
ATTN: SLD BEAR FCC Form 472
3833 Greenway Drive
Lawrence, KS 66046
Phone: 1-888-203-8100

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 **PRINTABLE PAGE**

The following has been successfully certified:

Certified on 8/9/2017 4:05 PM

Invoice ID: 2133143

Created on 1/11/2015 10:38 PM

Last updated on 8/9/2017 4:05 PM

Applicant Form Identifier WYFR472.13 TNCI

Block 1: Header Information

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1. Billed Entity Name

FREMONT CO SCHOOL
DISTRICT 24

2. Billed Entity Number

142529

3. Service Provider

Identification Number (SPIN)
143037263

Applicant FCC Form 498 ID

443021534

4. Contact Name

KAY WATSON

5. Contact Telephone Phone

(307) 876-2583

Contact Fax

(307) 876-2469

Contact Email

kwatson@fremont24.com

6. Total Reimbursement Amount

(total from Block 2, Column 14)

\$ 1433.23

Block 2: Line Item Information Per Funding Request Number

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7. FCC Form 471 Application Number (from Funding Commitment Decision Letter)	8. Funding Request Number (FRN) (from Funding Commitment Decision Letter)	9. Bill Frequency	10. Customer Billed Date	11. Shipping date to Customer or Last Day of Work Performed (mm/dd/yyyy)	12. Total (Undiscounted) Amount for Service	13. Discount Rate	14. Discount Amount Billed to USAC (Column 12 multiplied by Column 13)	Approval Status
1) 907157	2491724		7/1/2013		\$ 2388.71	60	\$ 1433.23	CERTIFIED

Block 3: Billed Entity Certification

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Contact Information for Billed Entity Authorized Person:

By logging into your account using your PIN, checking this box, and clicking the "certify" button at the end of the form, you have electronically signed the form. You are reminded that an electronic signature is the same as a handwritten signature on the form.

To see a copy of the Terms and Conditions to which you previously agreed, please click on the "Terms and Conditions" menu above.

Submission Date 8/9/2017

17. Name KAY WATSON
18. Title/Position BUSINESS MANAGER
20. Address 1 112 WEST THIRD ST
Address 2
City SHOSHONI
State WY
Zip Code 82649 -

19. Phone Number (307) 876-2583
19a. Fax Number (307) 876-2469
19b. Email kwatson@fremont24.com
19c. Name of Authorized Person's Employer Fremont County School District #24

OMB Number 3060 - 0856 Form 472

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Client Service Bureau: 1-888-203-8100

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